

EXHIBIT A-1

From: [Justin J. Sullivan](#)
To: [Chloe Davis](#)
Cc: [Christine Stowell](#); jlatham@tatelawri.com
Subject: Melise v. Coyne-Fague - RIDOC Discovery Responses
Date: Monday, January 31, 2022 10:48:00 PM
Attachments: [image001.png](#)
[RIDOC Response RFP 4.pdf](#)
[RIDOC Response RFP 5.pdf](#)
[RIDOC Responses to Amended RFP 3.pdf](#)
[DOC Privilege Log.pdf](#)
[Response No. 1 RIDOCRFP300001-RIDOCRFP30030.pdf](#)
[Response No. 4 Response No. 1 RIDOCRFP300031-RIDOCRFP30063.pdf](#)
[Response No. 2 RIDOCRFP40001-RIDOCRFP40004.pdf](#)

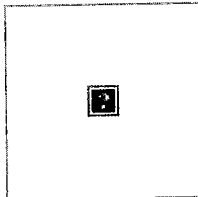
Good evening, Chloe:

Apologies for the late-night email. Attached please find the following, in addition to responsive documents:

- RIDOC Defendants' Response to Plaintiff's Amended Third Request for Production
- RIDOC Defendants' Response to Plaintiff's Fourth Request for Production
- RIDOC Defendants' Response to Plaintiff's Fifth Request for Production
- RIDOC Defendants' Privilege Log

Additionally, I have a large number of provider meeting minutes that I believe Dr. Clarke had mentioned during her depo, which may be responsive to Plaintiff's Fifth RFP, Request No. 1. Much like the Triage Meeting Minutes, the provider minutes also contain discussions about other inmates' medical conditions. However, the documents use only inmates' initials, so if you would agree to keep them attorneys eyes only, I can supplement that response and send them to you. I think we had a similar understanding for the Triage Minutes.

There a few other discovery-related issues I need to discuss with you. Are you available tomorrow (Tuesday) for a call?



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